

UNITED STATES DISTRICT COURT  
Eastern DISTRICT OF WISCONSIN

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INTERNATIONAL BROTHERHOOD OF  
TEAMSTERS AIRLINE DIVISION,

Plaintiff,

Case No. 2:10-cv-00203-LA

v.

FRONTIER AIRLINES, INC. and  
REPUBLIC AIRWAYS HOLDINGS, INC.,

Defendants.

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DECLARATION OF JEFFRY DOMRESE IN SUPPORT OF DEFENDANTS' MOTION FOR  
PARTIAL STAY AND POSTING OF A BOND

I, Jeffry Domrese, declare that the following is true and correct:

1. I am a Vice President of Maintenance for Republic Airlines Holdings, Inc. ("RAH"). In this position I report to RAH Chief Operating Officer Wayne Heller and my primary job responsibilities involve monitoring of all the RAH Air carrier Maintenance department. I have worked for RAH or its subsidiaries in various positions dating back to September of 2000.
2. As VP of Maintenance for RAH, I was personally involved in the decision to notify various Frontier maintenance employees who had "signed up" to transfer to Milwaukee to perform heavy maintenance work on Frontier Airbus aircraft on February 24, 2010, that their transfer requests would still be honored but they would henceforth be employed by Republic. I can personally attest that decision was made for business reasons associated with the impracticability of trying to set up an entire heavy maintenance operation with a core group of only approximately thirty five (35) Frontier maintenance employees who had indicated a willingness to relocate to Milwaukee.

3. To the best of my knowledge and belief, following my/RAH's announcement on February 24, 2010 that only approximately 35 Denver-based Frontier employees had indicated a willingness to relocate to Milwaukee and those who had so elected would still be allowed to transfer if they wanted, but only if they agreed to be employed by Republic as opposed to Frontier, 21 Frontier mechanics still professed a willingness to move to Milwaukee. Two (2) of these employees subsequently removed themselves from consideration by going on military leave. The remaining 19 Frontier mechanics agreed and actually did relocate to Milwaukee on or shortly after February 24, 2010.

4. Prior to February 24, 2010, the Milwaukee operation was fully-staffed to perform all the unscheduled daily ("line") and scheduled overnight ("RON") maintenance work on RAH aircraft, including the Frontier Airbus. There was and is no need to augment that workforce. The only reason for proceeding with the transfers of those Frontier mechanics willing to make the move was that the Company had committed to them that they would be allowed to move.

5. The former Frontier mechanics and related employees who moved to Milwaukee on or after February 24, 2010 and were employed by Republic Airlines were primarily assigned up until May 15, 2010 to "set up" operations relating to the planned eventual relocation of the heavy maintenance operations on Frontier Aircraft (Airbus 319's and 320's) that RAH had planned to relocate to Milwaukee. The set work is, for all intents and purposes, completed. Additionally, the relocation or transfer of heavy maintenance work to Milwaukee that was initially scheduled to occur in early April, and subsequently delayed to mid-July, 2010 has been further delayed and is even being reconsidered pending various business issues including, but not limited to, the rescission of offers that Republic had made to hire new mechanics and the ultimate outcome of this lawsuit. Unless and until a C-Check operation is established in Milwaukee, there is

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currently no work available to justify keeping these nineteen (19) former Frontier mechanics employed.

6. As Vice President of Maintenance for RAH I have a fairly significant knowledge of the CBA between Frontier and the IBT governing the craft and class of maintenance and related as well as parts clerks employed by Frontier. To the best of my knowledge and belief, there is absolutely no language in the Frontier/IBT mechanics and related collective bargaining agreement requiring Frontier/RAH to employ Frontier mechanics to perform any work on any aircraft owned and operated by non-Frontier affiliates of RAH.

Dated: May 24 2010.

  
Jeffrey Domrese